

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.

Plaintiff,

vs.

BRAD RAFFENSPERGER, et al.

Defendant.

**CIVIL ACTION FILE
NO.: 1:17-cv-2989-AT**

DECLARATION OF BRUCE P. BROWN

Bruce P. Brown hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.
2. I represent the Coalition Plaintiffs in this case.
3. Attached as Exhibit 1 is a screenshot of a photograph that accompanied an Atlanta Journal Constitution article by Mark Niese dated January 10, 2023.
4. Attached as Exhibit 2 is a true and correct copy of a December 4, 2022 memo from the Election Division to county election officials. Coalition Plaintiffs received this document in response to an Open Records Act request.

5. The following is a link to a February 4, 2023 Associate Press article on the growing concern over the security of electronic pollpads.

<https://apnews.com/article/arizona-united-states-government-2022-midterm-elections-donald-trump-los-angeles-651d0e923973daf28ff3b9d6105b4d74>.

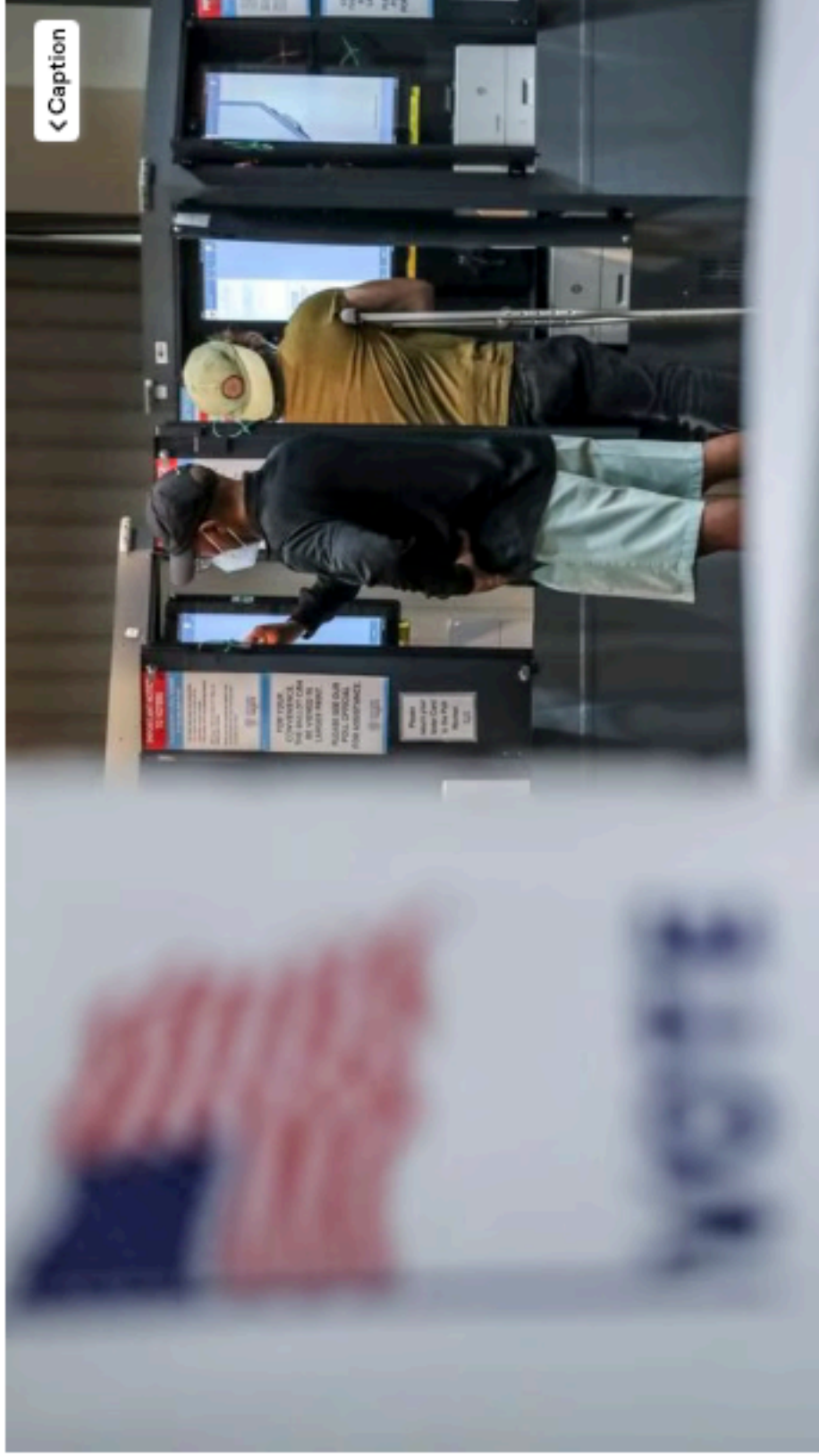
This 10th day of February, 2023.

A handwritten signature in blue ink, appearing to read 'B. P. Brown', is written over a horizontal line.

Bruce P. Brown

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Georgia asks judge to uphold voting system in election security case



Credit: JOHN SPINK / AJC

POLITICS

By **Mark Niese**, The Atlanta Journal-Constitution

Jan 10, 2023

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Subject: Emergency Elector's List
Date: Sunday, December 4, 2022 at 4:09:11 PM Eastern Standard Time
From: Elections Division - Do Not Reply
To: Black, Josh, Davenport, Angela, Deering, Amanda, Golden, Tyrell
CC: Evans, Blake, Harris, Jesse, Combs, Leigh, Northen, Nicolas, Anglin, Rebecca, Simmons, Rachell
Attachments: image001.jpg

Dear County Election Officials,

Your Emergency Backup List has been placed on Filezilla (County FTP folder – SOS COMMS) for you to retrieve, print and distribute to all your polling locations. This list contains all data on the county electors list by precinct, additionally denotes voters who **have** voted AIP or was issued an ABM.

It is critical you distribute these in the event a polling location should experience an emergency.

Thank you,

Nick Northen, Election Systems and Data Manager
Georgia Secretary of State
Elections Division
Main Office: 404-656-2871
sos.ga.gov



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